

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, ) CASE NO. CASE NO. CR 18-577 CRB  
Plaintiff, )  
v. ) STIPULATION REGARDING BUSINESS  
MICHAEL RICHARD LYNCH and ) RECORDS OF M&T BANK  
STEPHEN KEITH CHAMBERLAIN, )  
Defendants. )

The United States and Defendants Michael Richard Lynch and Stephen Keith Chamberlain hereby stipulate that the following documents are (1) business records pursuant to Federal Rule of Evidence 803(6) because they were made at or near the time by someone with knowledge; kept in the course of regularly conducted business; and made as part of a regular business activity; and (2) are authentic pursuant to Federal Rule of Evidence 901, 902(11), 902(13), and/or 902(14).

<b>Exhibit</b>	<b>Description</b>	<b>Custodian</b>
510	M&T Bank Records for January 2010 showing incoming wire for David Truitt from Autonomy	M&T Bank
627	Posted Autonomy – Zantaz Check No. 1702 to Capax Discovery LLC, dated March 10, 2010 in the amount of \$1,425,000.00	M&T Bank

Exhibit	Description	Custodian
662	M&T Bank Account Activity for Capax Discovery LLC – Account No. 9850261331 Statement Period March 1, 2010 – March 31, 2010	M&T Bank

DATED: March 14, 2024

Respectfully submitted,

PATRICK D. ROBBINS  
Attorney for the United States,  
Acting Under Authority Conferred by  
28 U.S.C. § 515

/s/

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ROBERT S. LEACH  
ADAM A. REEVES  
KRISTINA N. GREEN  
ZACHARY G.F. ABRAHAMSON  
Assistant United States Attorneys

DATED: March 14, 2024

CLIFFORD CHANCE US LLP

/s/

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CHRISTOPHER J. MORVILLO  
Attorneys for Defendant Michael Lynch

DATED: March 14, 2024

BIRD, MARELLA, BOXER, WOLPERT,  
NESSIM, DROOKS, LINCENBERG, &  
RHOW, P.C.

/s/

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GARY S. LINCENBERG  
Attorneys for Defendant Stephen  
Chamberlain